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VIA ECF

The Honorable Steven I. Locke United States Magistrate Judge United States District Court for the Eastern District of New York 100 Federal Plaza Central Islip, New York 11722

Re: Cecil Thomas, et al. v. TXX Services, Inc., et al.

U.S.D.C., E.D.N.Y. Civil Action No. 2:13-CV-02789-SIL

Dear Magistrate Judge Locke:

We represent Defendants TXX Services, Inc. and Patricia Hunt (collectively, "Defendants") in connection with the above-referenced action. We write, in accordance with Section 2.B of Your Honor's Individual Motion Practices, to respectfully request the postponement of the July 19, 2021, 11:00 a.m. status phone conference scheduled by the Court, in its April 19, 2021 Civil Conference Minute Order [Dkt. 270], to be conducted following mediation between the parties. Plaintiffs do not oppose this request.

This is the first request to reschedule the July 19, 2021 status phone conference. Good cause exists in support of this request. Defendants' counsel was forced, with the agreement of Plaintiffs' counsel, to postpone the private mediation of this action which was scheduled to be conducted on July 13, 2021. The reason for this postponement is the fact that the undersigned was diagnosed with a serious medical condition in early June, which has impaired the undersigned's ability to complete necessary preparations for the mediation. The parties are in the process of rescheduling the mediation to be conducted on August 30, 2021. The parties will immediately advise the Court once this date is confirmed so that, if the instant request meets with the Court's approval, the post-mediation status phone conference can be rescheduled.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ Jeffrey W. Pagano

Jeffrey W. Pagano

cc (via ECF): M. Kirschenbaum, Esq. D. Schulman, Esq.

I. Saxe, Esq.